



**THE CITY OF NEW YORK
LAW DEPARTMENT**

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June 11, 2007

BY ECF

Honorable Miriam Goldman Cedarbaum
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Hubbard v. City of New York, et al.
07 CV 3626 (MGC)

Your Honor:

I am an Assistant Corporation Counsel in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, attorney in the Office of the Corporation Counsel. I write to respectfully request an enlargement of time from June 11, 2007 until August 10, 2007, for the City of New York to answer or otherwise respond to plaintiff's complaint. Plaintiff's counsel, Stephen Curtis Jackson, Esq., consents to this request. This is the City's first request for an enlargement of time.

In accordance with this office's obligation under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this case, plaintiff alleges, *inter alia*, that he was falsely arrested by members of the New York City Police Department on or about September 7, 2004. Accordingly, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiff for execution a N.Y.C.P.L. § 160.50 release so that we can access the sealed records from his underlying criminal prosecutions, including our own police records.

Accordingly, defendant City respectfully requests that its time to respond to the complaint be extended to August 10, 2007.

Thank you for your consideration of this request.

Respectfully submitted,

/s/
Jennifer L. Rubin (JR 7938)
Assistant Corporation Counsel

cc: Stephen Curtis Jackson, Esq. (By ECF)